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Attorneys for Third-Party Defendants,  
SHEPHERD & SONS POULTRY FARM, INC.;  
and SHEPHERD'S PROCESSED EGGS, INC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HARRY WISEMAN,  
Plaintiff(s)

vs.

JACOBS ENTERTAINMENT, INC., a  
Delaware Corporation; ROCKY  
MOUNTAIN EGGS, INC., a California  
Corporation; SYSCO USA I, INC., a  
Delaware Corporation; DOES 1 through  
10, inclusive; and ROE ENTITIES 1  
through 10, inclusive,

Defendants.

CASE NO.: 3:19-cv-00153-RCJ-CBC

**STIPULATION AND ORDER TO  
EXTEND TIME FOR THIRD-PARTY  
DEFENDANTS TO RESPOND TO THIRD-  
PARTY COMPLAINT**

ACTION FILED: March 7, 2019  
TRIAL DATE: Not set

ROCKY MOUNTAIN EGGS, INC.,

Third-Party Plaintiff

Vs.

SHEPHERD & SONS POULTRY FARM,  
INC.; SHEPHERD'S PROCESSED  
EGGS, INC.,

Third-Party Defendants

**WHEREAS**, Plaintiff Harry Wiseman filed his complaint herein against, *inter alios*,  
Rocky Mountain Eggs, Inc. ("Rocky Mountain" or "Third-Party Plaintiff") on or about March

1 19, 2019; a First Amended Complaint on or about August 14, 2019; and a Second Amended  
2 Complaint on or about September 16, 2019;

3 **WHEREAS**, Rocky Mountain filed its Third-Party Complaint against Shepherd & Sons  
4 Poultry Farm, Inc., and Shepherd's Processed Eggs, Inc. (collectively "Shepherds" or "Third-  
5 Party Defendants") on or about November 26, 2019;

6 **WHEREAS**, Rocky Mountain served its Third-Party Complaint upon Shepherds on or  
7 about December 7, 2019;

8 **WHEREAS**, Shepherds' time to respond to the Third-Party Complaint is originally not  
9 required until December 28, 2019 (21 days);

10 **WHEREAS**, Shepherds requires additional time to prepare its responsive pleading to  
11 the Cross-Complaint, including time for Shepherds' counsel to associate local counsel in  
12 Nevada and/or open a local office in Nevada; and counsel for Rocky Mountain and Shepherds  
13 have amicably met and conferred on the issue and agreed that Shepherds may have an additional  
14 two (2) weeks to respond to the Third-Party Complaint;

15 **NOW, THEREFORE**, the above parties respectfully seek leave of this Court to extend  
16 the time for Shepherds to file and serve their responsive pleading to the Third-Party Complaint  
17 for two weeks on or before January 13, 2020.

18 DATED: December 27, 2019

**THORNDAL ARMSTRONG DELK  
BALKENBUSH & EISINGER**

19  
20 By: /s/ Justin Pfrehm  
21 JUSTIN PFREHM, ESQ.  
22 Nevada Bar No. 7484  
23 Attorneys for Defendant and Third-Party Plaintiff,  
24 ROCKY MOUNTAIN EGGS, INC.

25 DATED: December 27, 2019

**P.K. SCHRIEFFER LLP**

26 By: /s/ Viterbo Valera  
27 VITERBO L. VALERA, ESQ.  
28 Nevada Bar No. 9458  
Attorneys for Third-Party Defendants,

SHEPHERD & SONS POULTRY FARM, INC.,  
and SHEPHERD'S PROCESSED EGGS, INC.

**ORDER**

Having considered the stipulation for leave of court to extend the time for Shepherds to respond to the Third-Party Complaint to January 13, 2020, and good cause appearing therefore, the Court **GRANTS** the relief requested. The time for Shepherds to file and serve a responsive pleading to the Third-Party Complaint filed herein is extended to January 13, 2020.

Dated: 12/30/2019



United States Magistrate Judge

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